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- [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

United States District Court

Southern District of New York

Ricky Mott and ABC Mining, Plaintiffs

v.

Judge Sean Lane, Attorney Schell, Attorney Manzano, and Others, Defendants

Case No.: [To be assigned]

COMPLAINT FOR UNCONSTITUTIONAL RETALIATION AND INFLICTION OF EMOTIONAL DISTRESS

Jury Trial Demanded

Introduction

1. Plaintiffs Ricky Mott and ABC Mining bring this action against Judge Sean Lane, Attorney Schell, Attorney Manzano, and others for unconstitutional retaliation and infliction of emotional distress, seeking punitive damages of \$1,500,000,000.00 for the alleged imprisonment and abuse of civil rights.

Parties

2. Plaintiff Ricky Mott is a resident of New York, New York, and is proceeding pro se in this matter. ^{1 2}

¹ Ricky Mott, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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Plaintiff, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

Attorney:, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

Ricky Mott, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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² Ricky Mott, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

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3. Plaintiff ABC Mining is a business entity with its principal place of business in New York, New York^{3 4}.
4. Defendant Judge Sean Lane is a United States Bankruptcy Court Judge^{5 6}.
5. Defendant Attorney Schell is an attorney practicing in New York^{7 8}.
6. Defendant Attorney Manzano is an attorney practicing in New York^{9 10}.

Jurisdiction and Venue

7. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 as it arises under the Constitution and laws of the United States.^{11 12}
8. Venue is proper in this district as the events giving rise to this claim occurred in the Southern District of New York.^{13 14}

Factual Background

³ ABC Mining, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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⁵ Judge Sean Lane, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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United States Bankruptcy Court Judge Defendant, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

⁶ Judge Sean Lane, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

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⁷ Attorney Schell, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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⁸ Attorney Schell, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

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⁹ Attorney Manzano, pg. 2, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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Defendant, pg. 2, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

¹⁰ Attorney Manzano, pg. 2, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

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¹¹ Federal Question 28 USC 1331 Fed. Question, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

¹² Federal Question 28 USC 1331 Fed. Question, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

¹³ U.S. District Court, Southern District of New York (Foley Square), pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

¹⁴ U.S. District Court, Southern District of New York (Foley Square) Mott et al v. Lane et al, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

9. On April 2, 2025, Plaintiffs filed a complaint in the Southern District of New York, initiating case number 1:25-CV-02771.^{15 16}
10. The case was dismissed with a permanent bar to refiling after the notice of appeal was docketed, but other pleadings, including the appellant brief and notices, were barred from filing.^{17 18}
11. Judge Lane denied all motions and notices, barring Mr. Ricky Mott from proceeding on appeal before the United States Court of Appeals for the Second Circuit sua sponte^{19 20}.

¹⁵ 04/02/2025, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

¹⁶ Date Filed:, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

¹⁷ Description: Appeal Record Sent to USCA (Electronic File). Certified Indexed record on Appeal Electronic Files for 15 Notice of Interlocutory Appeal filed by Ricky Mott, 14 Notice of Interlocutory Appeal filed by Ricky Mott were transmitted to the U.S. Court of Appeals. (tp) (Entered: 04/17/2025) Appeal Remark as to 14 Notice of Interlocutory Appeal filed by Ricky Mott. IFP Denied 04/15/2025. (tp) (Entered: 04/17/2025), pg. 3, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

¹⁸ Transmission of Notice of Appeal and Certified Copy of Docket Sheet to US Court of Appeals re: 15 Notice of Interlocutory Appeal, 14 Notice of Interlocutory Appeal. (tp) (Entered: 04/17/2025) NOTICE OF INTERLOCUTORY Docket Status APPEAL from 13 Order on View Motion for Miscellaneous Relief. Document filed by Ricky Mott. (tp) Modified on 4/17/2025 (tp). (Entered: 04/17/2025) NOTICE OF INTERLOCUTORY View APPEAL from 13 Order on Motion for Miscellaneous Relief., pg. 3, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

¹⁹ ORDER denying 12 Motion for emergency judicial notice re: 12 MOTION. Plaintiff's request for an emergency judicial notice and issuance of restraining orders, a declaratory judgment, an injunction, and emergency issuance of summonses (ECF No. 12) is denied. The Clerk of Court is directed to terminate the motion. The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from this order would not be taken in good faith, and therefore in forma pauperis status is denied for the purpose of an appeal. Cf. Coppedge v. United States, 369 U.S. 438, 444-45 (1962) (holding that an appellant demonstrates good faith when he seeks review of a nonfrivolous issue) .. (Signed by Judge Laura Taylor Swain on 4/15/2025) (nb) (Entered: 04/15/2025), pg. 4, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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12. Plaintiffs allege that Judge Lane acted in bad faith and engaged in repeated filings to obstruct justice .^{21 22}
13. Mr. Ricky Mott asserts that he never filed a bankruptcy case 7 in any bankruptcy court, contrary to the defendants' claims.^{23 24}

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14. Plaintiffs allege violations of constitutional rights, including due process, protection under the law, and the 4th Amendment.^{25 26}
15. Defendants Schell and Manzano are accused of harassment, obstruction of mail, and serving process paperwork in a criminal manner, violating 18 USCA 1701 and 1702^{27 28}.

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16. Plaintiffs allege a conspiracy to cover up processes in the corrupt civil court of New York City Housing Part 52 .^{29 30}
17. Plaintiffs assert that US District Judge Taylor Swain exhibited bias in agreement with the defendants to bar the progress of the case.^{31 32}

Claims for Relief

Count I: Unconstitutional Retaliation

18. Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.
19. Defendants' actions constitute unconstitutional retaliation against Plaintiffs for exercising their rights under the Constitution.

Count II: Infliction of Emotional Distress

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20. Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.
21. Defendants' conduct was extreme and outrageous, intentionally or recklessly causing severe emotional distress to Plaintiffs.

Prayer for Relief

WHEREFORE, Plaintiffs respectfully request that this Court:

A. Award Plaintiffs punitive damages in the amount of \$1,500,000,000.00; B. Grant such other and further relief as the Court deems just and proper.

Jury Demand

Plaintiffs demand a trial by jury on all issues so triable.

Dated: May 14, 2025

Respectfully submitted,

Ricky Mott
104 West 4th St, Suite 400
New York, NY 10018
Pro Se Plaintiff ^{33 34}

ABC Mining
By: Ricky Mott, Representative ^{35 36}

³³ Ricky Mott, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

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Attorney Address:, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

104 West 4th St, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

Suite 400, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

New York, NY 10018, pg. 1, [Mott et al v Lane et al \(2\) beast lane.pdf](#)

³⁴ Ricky Mott, pg. 1, [Mott et al v Lane et al \(3\) \(1\) RECORDS MAY 25 14.pdf](#)

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